

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,

Plaintiff,

v.

JOHN DOES 1-50,

Defendants.

No. 2:19-cv-1445

DECLARATION OF WESLEY
BRANDI IN SUPPORT OF
AMAZON.COM, INC.'S MOTION
FOR EXPEDITED DISCOVERY

I, Wesley Brandi, have personal knowledge of the facts described below, am competent to make this declaration, and declare as follows:

1. I am the Founder of iPensatori, which is a consulting and software engineering business based in Washington state that specializes in the mitigation of online fraud and abuse. I have a Ph.D. in computer science, and have over ten years of experience investigating malicious online conduct like the scheme described below.

2. iPensatori was retained by Davis Wright Tremaine, LLP ("DWT") to investigate certain online marketing conduct. As part of this engagement, and to start the investigation, DWT provided me email messages that were received by victims.

A. Defendants' Marketing Scheme

3. Defendants' marketing scheme begins with emails to victims. A partial screenshot of one of Defendants' emails is below:



Thank you for your recent Purchase on Amazon.

You are invited to review your product and redeem your new 50-reward.

Your feedback helps customers pick the right products on Amazon.

It's a quick process! You are just one click away to activate your \$50 voucher.

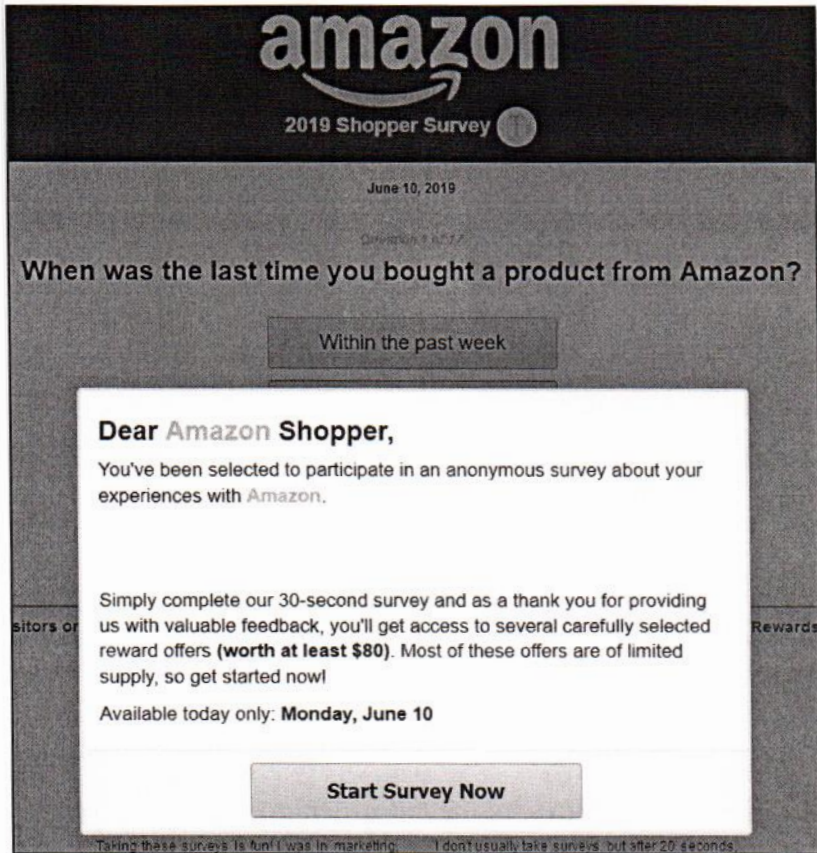
See Here

4. Defendants send these emails from email addresses that use Amazon's name, such as amazon.perks@fondationeaccess.com and amazon.survey@fashionsitejerseys.com. Defendants registered some of the domains used to send these emails with the registrars NameSilo, LLC; Namecheap, Inc.; and GoDaddy.com, LLC. Defendants host (or hosted) many of the domains used to send these emails with companies DedicatedNOW, Inc. and BitAccel, LLC.

5. Upon clicking the link in Defendants' emails, victims are redirected through a series of two or three domains that do not render content in the victims' browser, but serve to redirect victims to Defendants' survey. Defendants have used a number of redirect domains to funnel traffic, such as prematrinela.com and tboksolutions.com. Defendants registered their redirect domains with the registrars Name.com, Inc. and GoDaddy.com, LLC. Defendants host these domains with companies Clickbooth.com, LLC, OVH US LLC, Choopa, LLC, and Webapps, LLC.

6. After being referred through Defendants' redirect domains, victims arrive on Defendants' survey page. When victims first arrive on Defendants' landing page, they see a greeting that often addresses them as "Amazon Shopper." Defendants use numerous domains, and services from multiple companies, to operate their survey. For example, they registered one survey domain with GoDaddy.com, LLC, used services from Cloudflare, Inc. to mask the

1 true host of another survey, and hosted surveys with Rackspace, Inc., Mean Servers Limited,
2 and OVH US LLC. A partial screenshot of one version of Defendants' survey page is below:



7. After completing one of Defendants' surveys, victims are presented with
"rewards" or "offers." Clicking one sends victims through a series of redirect domains, an
affiliate network, and ultimately to an advertiser. Defendants use a number of services from
third-party companies as part of these redirects, such as Clickbooth.com, LLC.

21 **B. Defendants' Identities**

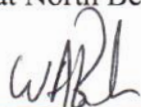
8. I have unsuccessfully attempted to uncover Defendants' identities through
various methods, including online research of their domains. The only publicly available
information about Defendants is the infrastructure they use to perpetuate their scheme.

9. After I identified the domains Defendants used to host their websites, I utilized
publicly available data to determine the various companies that registered Defendants' domains

1 and hosted Defendants' content. However, I could not (and cannot) determine the identity of
2 the persons behind the websites from public records. Among other factors preventing me from
3 uncovering Defendants' identities is Defendants' use of anonymizing services to register
4 domains.

5 I declare under penalty of perjury under the laws of the United States of America that
6 the foregoing is true and correct.

7 Executed this 9th day of September, 2019, at North Bend, Washington.

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Wesley Brandi